

## MA Stage I/II Regulations

### Summary of Revisions (undergoing Agency internal review):

1. **EVR PV vent valves and rotatable adaptors** – eliminate 180-day installation deadline; components must be installed upon decommissioning, and no later than 2 years from the effective date of the regulation. [310 CMR 7.24(3)(b)2.a.]
2. **Co-axial phase out** – allow existing coaxial Stage I systems to operate for 7 years (install poppetted drop tubes to pass tightness test); allow repair/replacement of poppetted drop tube (even though not EVR) for up to 7 years. Must install dual-point tank and full EVR no later than 7 years. [310 CMR 7.24(3)(b)2.c.]
3. **New /Updated CARB Executive Orders** – add EMCO Wheaton Executive Order (issued 8/27/14) and update references to four Executive Orders that were revised since the draft regulations were proposed. Add March 2014 CARB AST Executive Order that delays EVR compliance deadline for certain existing tanks until CARB approves equipment that is commercially available. [310 CMR 7.24(3)(c)1. Table 1 and Table 2]
4. **Inspection frequency** – eliminate weekly inspections but retain requirement to inspect within 24 hours of fuel drop (note that UST proposed regulation requires monthly inspections). [310 CMR 7.24(3)(d)2.]
5. **Records request** – change deadline from 48 hours to 7 days (makes same as UST proposal). [310 CMR 7.24(3)(d)7.]
6. **Recommendation operation** – allow commencement of operations after passing compliance tests (do not have to wait for MassDEP to receive paperwork). [310 CMR 7.24(3)(e)3.]
7. **Clarify that EVR Tests Are Not Required for Conventional Equipment** – regulations already say “applicable tests,” but made minor formatting changes to clarify. [310 CMR 7.24(3)(e)1.a.v.]
8. **Junk Yards** – exempt from Stage I EVR (i.e., apply existing Stage II exemption to Stage I). [310 CMR 7.24(3)(a)2.c. and d.]
9. **Facilities never in Stage II program and GDFs that decommissioned in 2012** – clarify that these must install EVR PV vent valve and rotatable adaptors within 2 years (same deadline as decommissioning). [310 CMR 7.24(3)(b)2.a.]

### No changes in response to comments (undergoing internal Agency review):

1. **Replace “motor vehicle fuel dispensing facility” with “GDF.”** This change is not necessary and it could potentially require changes to other regulations to ensure consistency. [310 CMR 7.00]
2. **Change definition of “monthly through-put.”** Adopted definition mirrors the federal NESHAP. [310 CMR 7.00]
3. **Allow Slip-on Spill Buckets.** Do not allow because they are not EVR.
4. **Exempt Marinas.** Stage I EVR applies to marinas and other sectors with tanks greater than 250 gallons.
5. **Reduce Level of Training for Weekly Inspections.** Stage I regulation requires no more than the current Stage II program. [310 CMR 7.24(3)(h)3.]